

Case5:12-cv-05297-BLF Document94 Filed09/14/15 Page1 of 2

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13 ANDREW S. ANDERSEN

Plaintiff JOINT

JOINT STIPULATION

17 W.J. WILSON, et al.,

Plaintiff, **JOINT STIPULATION FOR LIMITED
MODIFICATION OF DISCOVERY
STAY AND [PROPOSED] ORDER**

Judge: The Honorable Beth Labson Freeman
Trial Date: n/a
Action Filed: October 12, 2012

20 On March 9, 2015, the Court granted Defendants' unopposed motion for a protective order.
21 (ECF No. 63.) The Order stated: "Discovery shall be limited at this time to the issue of the
22 exhaustion of administrative remedies." (*Id.*) Defendants have moved for partial summary
23 judgment on the issue of administrative exhaustion and for dismissal of certain claims. (ECF No.

25 Accordingly, the parties hereby stipulate to modify the protective order to allow written
26 discovery under the applicable Federal Rules of Civil Procedure and any applicable local rules or
27 court orders, limited to the issues of retaliation and excluding Defendant Spearman.

Case 5:12-cv-05297-BLF Document 94 Filed 09/14/15 Page 2 of 2

1 Dated: September 11, 2015

Respectfully submitted,

2 KAMALA D. HARRIS
3 Attorney General of California
4 THOMAS S. PATTERSON
5 Supervising Deputy Attorney General



6 KATHLEEN BOERGERS
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10 *Spearman, Wilson, and Wynn*

11 Dated: 9/3, 2015

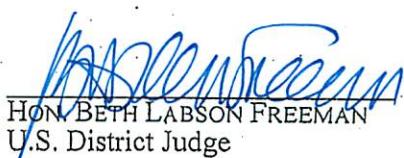
Respectfully submitted,

12 
13 ANDREW ANDERSEN
14 Plaintiff

15 
16 [PROPOSED] ORDER

17 IT IS SO ORDERED. The protective order is modified to allow written discovery by both
18 parties under the applicable rules pertaining to Plaintiff's claim of retaliation and excluding
19 Warden Spearman.

20 Dated: Sept 15, 2015

21 HON. BETH LABSON FREEMAN
22 U.S. District Judge


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